

RETROACTIVE ENROLLMENT FOR EMPLOYER GROUP HEALTH PLAN (EGHP) ENROLLEES**WS-EN4**

Name/HI Number	M+C Org. /System/ EGHP Error?	Effective Enrollment Date	Signature Date	Date M+CO Recieved?	Retroactive Enrollment Correct?	Lock-In Statement?	Comments

Standard: 95 percent correct.

Determination: Transfer results of this sample to the appropriate requirements at EN01, and EN17 - ~~EN19~~ **EN20** of the *Review Guide*. See Column Explanations for coded requirements related to specific columns.

RETROACTIVE ENROLLMENTS FOR EMPLOYER GROUP HEALTH PLAN (EGHP) ENROLLEES

WS-EN4

Requirement: In accordance with ~~Section 4204(e) of OBRA-1990 and M+C Manual Chapter 3, section 7.6~~ **42CFR422.60(f)**, the M+CO ~~Organization~~ may retroactively enroll Medicare applicants of EGHPs up to a period of 90 days.

Purpose: To determine whether the M+CO ~~Organization~~ retroactively enrolls Medicare applicants who are members of EGHP up to a period of 90 days.

(NOTE: When the M+CO ~~Organization~~ has attempted to convert EGHP commercial members to its Medicare M+CO ~~Organization~~, but the Medicare entitlement records are not established and the accretion rejects, or when the EGHP is late in notifying the M+CO ~~Organization~~ of the enrollee's intent to disenroll, does the M+CO ~~Organization~~ notify HCFA of retroactive enrollments? The enrollment is input no later than 90 days following the intended effective date, and the M+CO ~~Organization~~ has obtained a lock-in statement from the applicant (either through the application or on a separate form)).

Sample: The reviewer will develop the universe to include all retroactive enrollments submitted by the M+CO ~~Organization~~ to HCFA during the six month period ending with the month prior to the month of the scheduled visit. These are identified by Transaction Code 60 - enrollments on the *HCFA Monthly Transaction Reply/Monthly Activity Report* listings. From this universe, the reviewer will select 30 cases from the report in accordance with random selection methods discussed in the Review Guide Instructions, under Sampling Methodology. *(Note: During focused reviews, HCFA staff may elect to increase sample sizes to 100 cases or more, as deemed appropriate by the Agency.)* Three to five days (3-5) before the site visit, the reviewer will notify the M+CO ~~Organization~~ of the 30 cases to be pulled. If the sample pulled does not provide enough concrete data on the procedures followed by the M+CO ~~Organization~~ in correctly handling retroactive enrollments, then increase the number of files to be reviewed.

Instructions: Pull enrollee files and other information (e.g., EGHP notices the M+CO ~~Organization~~ on commercial member activity) to ascertain how the M+CO ~~Organization~~ handled the retroactive enrollment process ~~and to determine whether effective dates were within 90 days prior to HCFA notification~~, and if lock-in statements were obtained from applicants. ~~For each case, verify the information in the categories on the chart (WS-EN4).~~

Column Explanations:

Name/HI Number: Self-explanatory.

M+C Organization/System/EGHP Error? Was the need for retroactive enrollment due to an M+CO ~~Organization~~ oversight, a HCFA Systems problem (i.e., no record of Part B entitlement), or due to the EGHP (i.e., late notification of the enrollee's intent to enroll)?

Effective Enrollment Date: Self-explanatory.

Signature Date: Date application was signed.

Date M+CO Recieved: Date M+CO recieved the application.

Retroactive Enrollment Correct? Was the retroactive enrollment correct? If the M+CO ~~Organization~~ was not able to process the application in a timely manner to effectuate the transition with no break in enrollment, verify if a retroactive enrollment was processed through HCFA. ~~Verify that the effective date was no earlier than 90 days prior to the date HCFA was notified.~~ Did the M+CO ~~Organization~~ process the enrollment accurately (i.e., enroll no earlier effective date than the first of the month after the **receipt of lock-in was acknowledged** month the application was signed)? **Transfer result to EN18.**

Lock-In Statement? Was there a lock-in statement on file? Verify if either on the application for the Medicare ~~M+CO Organization~~, or on some other document, applicants were informed of their obligation to receive services from in-plan providers and had an opportunity to acknowledge understanding by signing and dating the form. ~~If there was no lock-in statement, check Medicare fee for service claims processing records to ascertain whether payment was made on behalf of the enrollee during the period covered by the retroactivity.~~

Transfer result to EN17 EN18.

Comments: Self-explanatory.

***Note:** All units of analysis **must** be for EGHP enrollees. If some units of analysis are not EGHP, ~~M+CO Organization~~ is inappropriately enrolling applicants; this information should be considered in making determination at AM02a ~~&EN08~~ in Section I, Administration and Management.